

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

FILED
2025 APR 14
CLERK
U.S. DISTRICT COURT

GEOFFREY A. THOMAS,
Plaintiff

v.

JEFFERY SHIELDS and
TEREL SHIELDS,
Defendants

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Case No. 2:24-MC-00181-RJS-JCB

**NOTICE OF SUPPLEMENTAL FILING IN SUPPORT OF MOTION TO QUASH
SUBPOENA TO PCF INSURANCE SERVICES**

Defendant Jeffery Shields, appearing pro se, respectfully submits this supplemental filing in further support of his pending Motion to Quash Subpoena to PCF Insurance Services, currently before this Court.

On April 14, 2025, Defendant filed a Notice of Improper Production and Request for Protective Order, which included a supporting declaration and proposed order. That filing addressed a separate but closely related incident involving the unauthorized production of documents by First Utah Bank, pursuant to a subpoena issued by Plaintiff Geoffrey Thomas without notice to Defendant.

The circumstances described in that filing underscore a broader and ongoing pattern of post-judgment discovery abuse. Although the First Utah subpoena is distinct from the one served on PCF Insurance Services, both efforts are part of a coordinated campaign by Plaintiff to access highly sensitive, confidential commercial and financial records—records that bear no reasonable relation to the underlying judgment and that implicate serious privacy and competitive interests.

Accordingly, Defendant requests that the Court consider the April 14, 2025 Notice of Improper Production and Request for Protective Order, together with the accompanying declaration and proposed order, as additional and highly relevant context supporting the Motion to Quash the PCF subpoena.

In the interest of judicial economy, Defendant further requests that the Court evaluate both matters in tandem and consider coordinated relief as necessary to prevent further harm to non-party stakeholders and to preserve the integrity of the discovery process.

Respectfully submitted,

Dated : April 14 2025

/s/ Jeffery Shields

Jeffery Shields

Pro Se Judgment Debtor

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed this 14th day of April 2025 to:

Tanya N. Lewis (12363)
Tait A. Meskey (17495)
SNELL & WILMER L.L.P.
15 West South Temple Suite 1200
Gateway Tower West
Salt Lake City, Utah 84101
Email: tlewis@swlaw.com
tmeskey@swlaw.com

/s/ Jeffery Shields

Jeffery Shields, Pro Se